

EXHIBIT B



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April 17, 2023

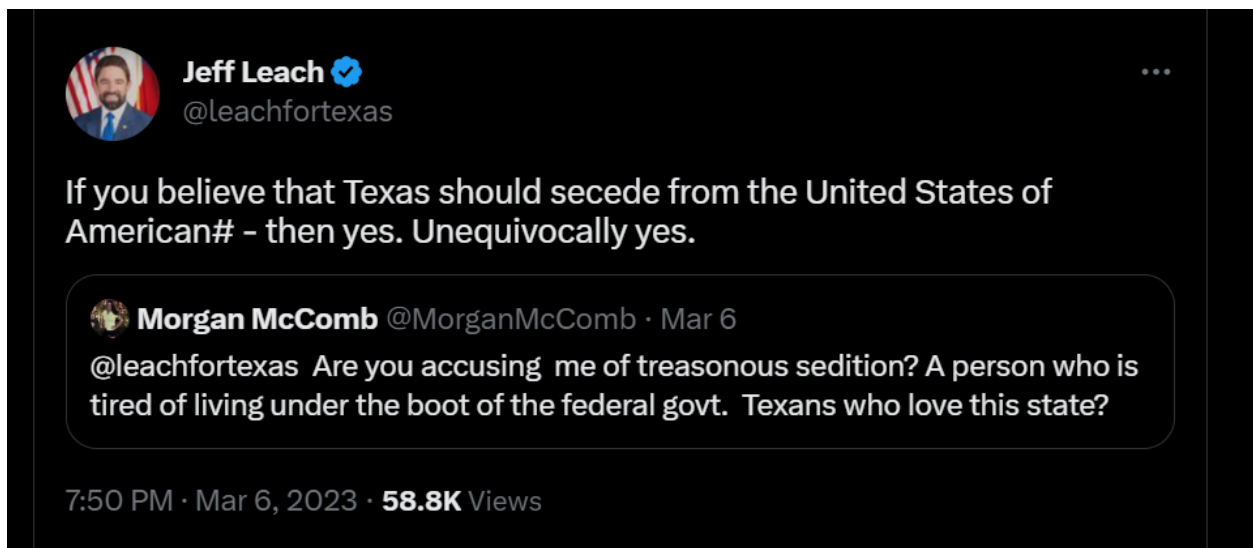
Rep. Jeff Leach
300 E. Davis St., #170
McKinney, TX 75069

Sent via US certified mail and via email to jeff@jeffleach.com

Re: Demand for Retraction of Defamatory Statement

Dear Rep. Leach:

Morgan McComb has retained me as counsel in the matter of the following defamatory statement you published against her on Twitter.



Texas appellate precedent indicates that this type of statement is actionable defamation if the statement was not made in a context where a reasonable person of ordinary intelligence would understand that the statement was not intended to be taken literally. *Compare Dickson v. Afiya Ctr.*, 636 S.W.3d 247 (Tex. App.—Dallas 2021) *with Lilith Fund for Reprod. Equity v. Dickson*, No. 21-0978, 2023 WL 2193586, at *10 (Tex. Feb. 24, 2023). Unlike the statement “abortion is murder” in these cases, the general public does not have an understanding that advocating for Texas independence is not sedition or treason under the definitions of those terms in the United States Code. *See* 18 U.S.C. §§ 2381 and 2384. Thus, your statement appears to be actionable defamation per se because it falsely accuses Ms. McComb of a crime, and you have knowledge that advocating for Texas independence is not literally a crime.

Accordingly, Ms. McComb demands that you issue a retraction of this statement on your Twitter indicating to the public that Ms. McComb’s support of the TEXIT Bill does not constitute the crime of sedition or treason or “seditious treason” as you called it. Please confirm that you will issue the retraction by close of business on April 18. Thank you in advance.

Best regards,

A handwritten signature in black ink, appearing to read "Paul Davis", written in a cursive style.

Paul Davis